

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Petitioner,

v.

CH2M HILL, INC.,

Respondent.

CASE NO. C18-1452

[PROPOSED] ORDER GRANTING THE
UNITED STATES' PETITION FOR
ENFORCEMENT OF CIVIL
INVESTIGATIVE DEMAND
PURSUANT TO 31 U.S.C. § 3733 AND
TO COMPEL PRODUCTION OF
DOCUMENTS

THIS MATTER comes before the Court on Petitioner The United States of America's
Petition and Memorandum for Enforcement of Civil Investigative Demand (CID) Pursuant to
31 U.S.C. § 3733 and to Compel Production of Documents (Petition).

The Court, having reviewed the pleadings and materials in this case, hereby
ORDERS that:

Petitioner's Petition is **GRANTED**; and

Defendant CH2M Hill, Inc. is **ORDERED** to comply with the express terms of the
CID and produce all documents previously withheld based on the basis of attorney-client
privilege and/or work product doctrine related to Argy, Wiltse & Robinson PC's work

performed under Work Order PO 942452, as identified in CH2M Hill counsel's March 19, 2018 "Index of Documents Withheld Under a Claim of Privilege".

DATED this _____ day of _____, 2018.

United States District Judge

Presented by:

s/ David East

DAVID R. EAST, WSBA #31481
Assistant United States Attorney
Western District of Washington
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4073
E-mail: david.east@usdoj.gov

s/ Kayla C. Stahman

KAYLA C. STAHMAN, CA #228931
Assistant United States Attorneys
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4067
Email: kayla.stahman@udsdoj.gov